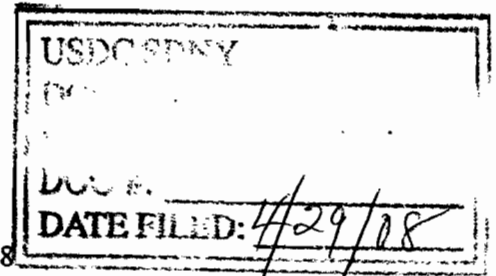


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April 24, 2008

BY FACSIMILE & ECF  
Hon. Shira A. Scheindlin  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Re: United States v. John Melicharek  
Client: Michel Iuni  
07 Cr. 907 (SAS)

Dear Judge Scheindlin:

Please accept this letter as a request to modify the conditions of release for Michael Iuni so as to facilitate his attending the annual diner dance on May 10, 2008 for the Iron Workers Union, Local 45 of which Mr. Iuni is a member. He would attend the dance accompanied by his brother, wife and sister, two of whom are signatories upon his bond.

On October 23, 2007 following hearing the court granted bail to Michael Iuni with conditions of release which included the following: \$1,000,000.00 PRB secured by parents home and signed by defendant's parents, brother and sister; home detention with electronic monitoring; defendant to reside with his parents at his parent's home; voluntary out-patient drug treatment; defendant to travel to drug treatment program only."

It is proposed that Mr. Iuni's electronic monitoring be turned off between 5:00 P.M.-1:00 A.M. to permit him to attend the annual event. I enclose a copy of a letter from James Kearney, Business Representative for Local 45 concerning the request.

It is respectfully requested that Mr. Iuni's conditions of release be modified to permit him to leave his residence to attend to this annual event. I have spoken with AUSA Elie Honig and Pre-trial Officer Scott Kowal and both consent to his modification.

Respectfully submitted,

Alan Nelson

cc: AUSA Elie Honig (ECF)

Defendant's request is granted.  
Iuni's conditions of release are hereby modified to permit him to attend the event on May 10, 2008, from 5:00 p.m. to 1:00 a.m. on May 11, 2008, and his electronic monitoring is to be disabled for that period.

SO ORDERED:

Dated: New York, New York  
April 28, 2008

Shira A. Scheindlin  
U. S. D. J.

*International Association*

OF BRIDGE, STRUCTURAL, ORNAMENTAL  
AND REINFORCING IRON WORKERS, LOCAL NO. 45

Affiliated with A. F. of L.

PAT DRUM  
President

JAMES KEARNEY  
Business Representative

WILLIAM KEARNEY  
Recording Secretary

558 NEWARK AVENUE • JERSEY CITY, N.J. 07306

Phone: 201-653-3365; 201-653-3705

JAMES KEARNEY, JR.  
Fin. Sec'y & Treasurer



April 8, 2008

To whom it may concern,

Michael Iuni would like to attend our annual dinner dance on May 10, 2008 at The Westmount Country Club on Rifle Camp Road in West Paterson, NJ. The Affair will Begin at 630pm and last until midnight.

Fraternally yours,

James Kearney, Jr.  
FST